

### REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-9, 11-25, 29-32, and 34 are pending in this case. Claims 1-9, 11-18, 21-24, 29-32, and 34 are amended and Claims 10 and 33 are canceled, without prejudice or disclaimer, by the present amendment. Claims 2-9, 11-18, 22-24, 30-32, and 34 are amended to correct matters of form, and the changes to Claims 1, 3, 21, and 29 are supported in the originally-filed disclosure at least at Fig. 8, at page 11, lines 28-29, and at page 13, lines 11-16. Thus, no new matter is added.

In the outstanding Office Action, Claims 1-7, 9-11, 14-27, and 29-34 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kohonen et al. (“Self Organization of a Massive Document Collection”, herein “Kohonen”) in view of Derthick (“Interfaces for Palmtop Image Search”); Claim 8 was rejected under 35 U.S.C. § 103(a) as unpatentable over Kohonen in view of Derthick, further view of Doerre et al. (U.S. Patent No. 6,446,061, herein “Doerre”); and Claims 12 and 13 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kohonen in view of Derthick, further view of Bruijn et al. (“Patterns of Eye Gaze during Rapid Serial Visual Presentation”, herein “Bruijn”).

The rejection of Claims 26 and 27 under 35 U.S.C. § 103(a) is respectfully submitted as moot in light of the previous cancellation of those claims.

Similarly, the rejection of Claims 10 and 32 under 35 U.S.C. § 103(a) is respectfully submitted to be moot in light of the present cancellation of those claims.

Amended Claim 1 is directed to a video processing apparatus and includes an information retrieval system with “a user control configured to define a first search criterion for selecting information items and a second search criterion, the second search criterion defining a subset of the array of nodes such that only information items that meet the first

search criterion and are located in the subset of the array of nodes defined by the second search criterion are selected.”

Kohonen and Derthick do not teach or suggest at least the above-quoted element of Claim 1.

As noted at page 3 of the outstanding Office Action, Kohonen describes a keyword search and displays retrieved search results based on **the** search constraint. However, Kohonen does not teach or suggest “ **a second search criterion...**defining a subset of the array of nodes,” as recited in amended Claim 1. Further, Derthick does not cure the deficiencies of Kohonen and is not cited in the outstanding Office Action as teaching a user control as defined by Claim 1. Derthick compares interfaces for Palmtop image search and discusses the results of testing different graphical user interfaces, but does not teach or suggest “a user control configured to define a first search criterion for selecting information items and a second search criterion,” as recited in amended Claim 1.

Because Kohonen and Derthick, taken in combination, do not teach or suggest at least the above-discussed features of amended Claim 1, Applicant respectfully requests that the rejection of Claim 1 under 35 U.S.C. § 103(a) be withdrawn.

Claims 21 and 29, though differing in scope and statutory class from Claim 1, patentably define over the combination of Kohonen and Derthick for substantially similar reasons as Claim 1. Thus, Applicant respectfully requests that the rejection of Claims 21 and 29 under 35 U.S.C. § 103(a) be withdrawn.

Claims 2-9 and 11-20 depend from Claim 1, Claims 22-25 depend from Claim 21, and Claims 30-32 and 34 depend from Claim 29. Thus, Claims 2-9, 11-20, 22-25, 30-32, and 34 patentably define over the combination of Kohonen and Derthick for the reasons discussed above with respect to independent Claims 1, 21, and 29. Further, Doerre, which is additionally cited against Claim 8, and Bruijn, which is additionally cited against Claims 12 and 13, do not

cure the deficiencies of Kohonen and Derthick with respect to independent Claims 1, 21, and 29.

Doerre describes taxonomy generation for document collections involving a subset selection step, wherein a **subset of the documents** is selected. However, the subset of documents described in Doerre does not teach or suggest “the second search criterion defining a **subset of the array of nodes**,” as recited in Claim 1, from which Claim 8 depends, because Claim 1 further defines the array of nodes by reciting “a detector configured to detect positions of nodes, within the array of nodes, to which the selected information items have been mapped,” and the documents of Doerre do not teach or suggest the array of nodes recited in Claim 1.

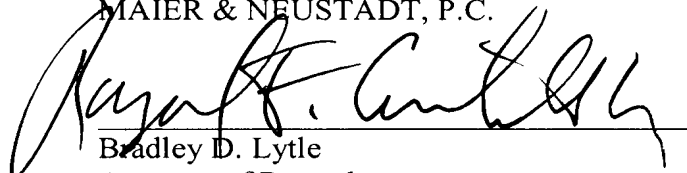
Bruijn describes the effect of display design decisions on participants’ eye movements but does not teach or suggest a user control and is not cited in the outstanding Office Action for that feature.

Thus, Applicant respectfully requests that the rejections under 35 U.S.C. § 103(a) of Claims 2-9, 11-20, 22-25, 30-32, and 34 be withdrawn.

Accordingly, the outstanding rejections are traversed and the pending claims are believed to be in condition for formal allowance. An early and favorable action to that effect is, therefore, respectfully requested.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'Bradley D. Lytle', is written over a horizontal line.

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